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August 31, 2020

VIA ELECTRONIC FILING

Magistrate Judge Arlene R. Lindsay United States District Court, Eastern District of New York Long Island Federal Courthouse 814 Federal Plaza Central Islip, NY 11722-4451

Magistrate Judge Steven L. Tiscione United States District Court, Eastern District of New York 100 Federal Plaza (Chambers 714) Central Islip, NY 11722

Re: Stellato v. Hofstra University, Civil Action No. 2:20-cv-01999 (JS-ARL) Buckley v. Hofstra University, Civil Action No. 2:20-cv-02424 (JS-ARL) Latvala v. Hofstra University, Civil Action No. 2:20-cv-02368 (JS-ST)

Dear Judge Lindsay and Judge Tiscione:

We represent Hofstra University in the above-referenced actions.

In anticipation of a motion to consolidate these three actions, on July 30, 2020, we requested an extension in the deadline to answer or otherwise respond to the complaints until September 4, 2020. Your Honors granted this request on July 31, 2020 in the *Stellato* and *Buckley* actions and on August 5, 2020 in the *Latvala* action.

On August 19, 2020, counsel for the Plaintiff in the *Stellato* action filed a motion to consolidate the actions. *Civil Action No. 2:20-cv-01999* (ECF Doc. No. 12). This motion is not opposed by the University. In the motion and proposed order, Plaintiff proposes to file a consolidated pleading within 30 days of an order granting the motion to consolidate, and proposes to allow the University until 30 days thereafter to answer or otherwise respond to the consolidated pleading.

The Court has not yet ruled on the motion to consolidate. In light of the pending motion and anticipated amended pleading, the University hereby requests that the Court extend its answer deadlines in each of the above-referenced cases to a date that falls 30 days after the filing of a consolidated amended complaint.

Counsel for the Plaintiffs have consented to this request.

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If this request meets with the Court's approval, please "so order" an adjourned deadline for the University to answer or otherwise respond to the complaints in each purported class action.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

Suzanne Messer

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cc: Joseph Marchese, Esq. Andrew Obergfell, Esq. Sarah Westcot, Esq.

> Eleanor Drake, Esq. Ellen Noteware, Esq. Joseph Hashmall, Esq.

Nathaniel Tarnor, Esq. Steve Berman Daniel J. Kurowski, Esq. Whitney Siehl, Esq.